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7 IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
8 DIVISION II

9 IN RE PERSONAL RESTRAINT PETITION OF: No.: 46673-2-II
10

11 JOSE ISIDRO-SOTO,

**RESPONSE TO PERSONAL
RESTRAINT PETITION**

12
13 1. **IDENTITY OF RESPONDING PARTY.**

14 The State of Washington responds by and through Katherine L. Svoboda, Grays Harbor
15 County Prosecuting Attorney and seeks relief as designated in Part 2 of this response.

16 2. **RELIEF REQUESTED.**

17 The State of Washington requests dismissal of the Personal Restraint Petition filed herein.

18 3. **FACTUAL BACKGROUND.**

19 The petitioner pled guilty to Assault in the Second Degree and a Deadly Weapons
20 enhancement on October 4, 2004. In section 6(i) of the petitioner's signed Statement on Plea of
21 Guilty was the language:
22

23 If I am not a citizen of the United States, a plea of guilty to an offense punishable as a
24 crime under state law is ground for deportation, exclusion from admission to the
United States, or denial of naturalization pursuant to the laws of the United States.¹

25 Further, in section 12 was the language:
26

27 ¹ See attached Statement of Defendant on Plea of Guilty, Page 3. (Petitioner notes that this was not specifically initialed;
however, unlike other portions of the plea statement, there is no instruction to do so.)

1 My lawyer has explained to me, and we have fully discussed, all of the above
2 paragraphs...I understand them all. I have been given a copy of this "Statement of
Defendant on Plea of Guilty." I have no further questions to ask of the judge.²

3 The Court affirmed that the defendant asserted that he had previously read the plea statement. The
4 court found that the plea was "knowingly, intelligently and voluntarily made" and that the
5 "[d]efendant understands the charges and the consequences of the plea."³ The petitioner was
6 sentenced on October 11, 2004.
7

8 The petitioner filed a Motion to Withdraw Plea and Vacate Record of Conviction in Grays
9 Harbor Superior Court on August 4, 2014. The Superior Court entered an order finding that the
10 petitioner's motion was time-barred and that he failed to make a substantial showing that he was
11 entitled to relief on August 18, 2014. This order transferred the motion to be considered as a Personal
12 Restraint Petition pursuant to CrR 7.8(c)(2).
13

14 **4. GROUNDS FOR RELIEF AND ARGUMENT.**

15 This Court has resolved the petitioner's claim in *State v. Martinez-Leon*, 174 Wash.App. 753,
16 300 P.3d 481; review denied, 179 Wash. 2d 1004, 315 P.3d 530 (2013). In *Martinez-Leon*, the
17 defendant pled guilty to Unlawful Imprisonment (Domestic Violence) and Assault Fourth Degree
18 (Domestic Violence) on May 11, 2006. Martinez-Leon's signed statement on plea of guilty form
19 provided the following provision "If I am not a citizen of the United States, a plea of guilty to an
20 offense punishable as a crime under state law is grounds for deportation, exclusion from admission to
21 the United States, or denial of naturalization pursuant to the laws of the United States." *Martinez-*
22 *Leon*, 174 Wash. App. at 756. The trial court explained the consequences of pleading guilty. "The
23 trial court did not, however, discuss any potential immigration consequences resulting from
24 Martinez-Leon's decision to plead guilty. The trial court determined that an interpreter read the guilty
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26

27 ² Statement of Defendant on Plea of guilty, Page 6, Section 12.

³ Statement of Defendant on Plea of guilty, Page 6.

1 plea form in its entirety to Martinez-Leon, he understood the form, he did not have any questions,
2 and that he had signed the form. The trial court accepted Martinez-Leon's guilty plea, finding that he
3 entered the plea, 'knowingly, intelligently and voluntarily, with a full understanding of its meaning
4 and effect with a factual basis.'" *Martinez-Leon* at 756-57.

5 On June 27, 2011, Martinez-Leon filed a CrR 7.8 motion for relief from judgment or to
6 withdraw his guilty pleas. *Id.* at 757. The trial court held a hearing and entered a written order
7 denying the defendant's motion. The trial court concluded that the motion was time-barred under CrR
8 7.8 and RCW 10.73.090. The trial court further concluded that the requirement that an immigrant
9 defendant be informed about the potential immigration consequences of a guilty plea was not a
10 significant change in law and that equitable tolling did not apply. The trial court's written order also
11 indicated that it may or may not have imposed a 364 day suspended sentence on the fourth degree
12 assault conviction had defense counsel requested it at Martinez-Leon's sentencing hearing. Martinez-
13 Leon appealed the trial court's order denying his CrR 7.8 motion for relief from judgment or to
14 withdraw his guilty plea. *Id.* at 758-59.

15 Upon review, this Court held that, under these facts, Martinez-Leon could not collaterally
16 attack his conviction beyond the statutorily prescribed one-year period. Other than an unsupported
17 assertion that the defense attorney gave conflicting information, there is nothing that distinguishes the
18 case at bar from *Martinez-Leon*.

19 CrR 4.2(f) provides that a trial court "shall allow a defendant to withdraw the defendant's plea
20 of guilty whenever it appears that the withdrawal is necessary to correct a manifest injustice." When,
21 as in the case at bar, a criminal defendant moves to withdraw his guilty plea after judgment has been
22 entered, CrR 7.8 governs CrR 4.2(f). CrR 7.8(b)(5) provides that the trial court may relieve a party

1 from a final judgment for “[a]ny other reason justifying relief from the operation of the judgment.”
2 CrR 7.8 motions are subject to the provisions of RCW 10.73.090 and RCW 10.73.100. CrR 7.8(b).

3 RCW 10.73.090 states in part:

4 (1) No petition or motion for collateral attack on a judgment and sentence in a
5 criminal case may be filed more than one year after the judgment becomes final if
6 the judgment and sentence is valid on its face and was rendered by a court of
competent jurisdiction.

7 (2) For the purposes of this section, “collateral attack” means any form of post-
8 conviction relief other than a direct appeal. “Collateral attack” includes, but is not
9 limited to, a personal restraint petition, a habeas corpus petition, a motion to vacate
judgment, a motion to withdraw guilty plea, a motion for a new trial, and a motion
to arrest judgment.

10 The petitioner concedes that he filed his CrR 7.8 motion beyond the one-year time period set forth in
11 RCW 10.73.090 and that none of the grounds in 10.73.090(6) are present. To meet RCW
12 10.73.100(6)'s requirements, a petitioner must demonstrate that “sufficient reasons exist to require
13 retroactive application” of *Padilla*. The petitioner concedes he cannot meet this burden. In *Chaidez*,
14 the United State Supreme Court held that its decision in *Padilla* announced a “ ‘new rule’ ” that did
15 not apply retroactively to cases that were final before the *Padilla* decision was issued: 133 S.Ct. at
16 1107. “[A] person whose conviction is already final may not benefit from the [*Padilla*] decision in a
17 habeas or similar proceeding.” *Chaidez*, 133 S.Ct. at 1107. However, he asserts that his motion was
18 timely under the doctrine of equitable tolling.

19 The equitable tolling doctrine “ ‘permits a court to allow an action to proceed when justice
20 requires it, even though a statutory time period has nominally elapsed.’ ” *In re Carlstad*, 150
21 Wash.2d 583, 593, 80 P.3d 587 (2003) (quoting *State v. Duvall*, 86 Wash.App. 871, 874, 940 P.2d
22 671 (1997)). However, “application of equitable tolling ... must only be done in the narrowest of
23 circumstances and where justice requires.” *In re Pers. Restraint of Carter*, 172 Wash.2d 917, 929,
24

1 263 P.3d 1241 (2011). RCW 10.73.090 can be subject to equitable tolling in a proper case. *State v.*
2 *Littlefair*, 112 Wash.App. 749, 759, 51 P.3d 116 (2002).

3 In *Littlefair*, the defendant, a resident alien, entered a guilty plea. 112 Wash.App. at 752, 51
4 P.3d 116. Littlefair's defense counsel did not inquire about Littlefair's immigration status and did not
5 advise Littlefair about the potential immigration consequences of a guilty plea. *Littlefair*, 112
6 Wash.App. at 755, 51 P.3d 116. Littlefair's defense counsel also struck language on the guilty plea
7 form stating that deportation was a possible consequence of entering a guilty plea. *Littlefair*, 112
8 Wash.App. at 752–54, 51 P.3d 116. Two years later, the INS notified Littlefair that it would seek to
9 deport him because of his conviction. *Littlefair*, 112 Wash.App. at 755, 51 P.3d 116. Littlefair moved
10 to withdraw his guilty plea on the basis that he would not have pled guilty had he known he would be
11 subject to deportation. *Littlefair*, 112 Wash.App. at 755, 51 P.3d 116. This court concluded that it was
12 appropriate to apply equitable tolling to the **unique circumstances** of Littlefair's case, noting that
13 Littlefair did not know about the deportation consequences of his guilty plea due to mistakes by his
14 attorney, the trial court, and the INS. *Littlefair*, 112 Wash.App. at 762–63, 51 P.3d 116 (emphasis
15 added).

16 Even under the doctrine of *Littlefair*, the equitable tolling ends on “the day on which the
17 defendant first discovered that deportation was a consequence of his plea.” *Littlefair*, 112 Wn.App.
18 763. Nothing in the pleadings filed has demonstrated when the defendant had actual notice that his
19 plea of guilty would affect his immigration status.

20 In contrast to the unique circumstances justifying equitable tolling in *Littlefair*, here the
21 petitioner signed a statement on plea of guilty that provided, “If I am not a citizen of the United
22 States, a plea of guilty to an offense punishable as a crime under state law is grounds for deportation,
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1 exclusion from admission to the United States, or denial of naturalization pursuant to the laws of the
2 United States.”

3 The claims of the petitioner to not merit application of the equitable tolling doctrine to the
4 time limit in RCW 10.73.090. Even if trial counsel gave the erroneous advice claimed by the
5 petitioner, he was correctly advised by the plea statement and the trial court found that his plea was
6 made with a full understanding of the consequences of such plea.
7

8
9 **5. CONCLUSION.**

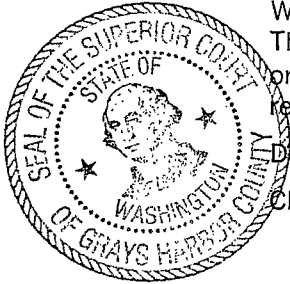
10 The petitioner’s claim is time-barred pursuant to RCW 10.73.090 and his petition should be
11 denied. Further, the petitioner cannot show that he was not on notice of the immigration
12 consequences that potentially followed his plea, so he fails to make a substantial showing that he is
13 entitled to the relief he seeks.
14

15 DATED this 25 day of April, 2015.

16 Respectfully Submitted,

17 
18 By: _____

19 KATHERINE L. SVOBODA
20 Prosecuting Attorney
21 WSBA #34097
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Certificate of Clerk of the Superior Court of Washington in and for Grays Harbor County. The above is a true and correct copy of the original instrument which is on file or of record in this court.

Done this 4-20-2015 day of April
Cheryl Brown, Clerk By Cindy Ral Deputy Clerk

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OF COUNTY CLERK
GRAYS HARBOR CO. WA.

'04 OCT -4 P3:23

CITY OF GRAYS HARBOR
COUNTY CLERK

SUPERIOR COURT OF WASHINGTON FOR GRAYS HARBOR COUNTY

STATE OF WASHINGTON,

Plaintiff

VS

Jose Isidro - Soto

Defendant

NO. 04-1-00412-1

STATEMENT OF DEFENDANT
ON PLEA OF GUILTY TO NON-
SEX OFFENSE (STTDFG)

1. My true name is Jose Isidro - Soto
2. My age is DOB: 02/24/87 3. I went through the 9th + GED grade.

4. I HAVE BEEN INFORMED AND FULLY UNDERSTAND THAT:

- (a) I have the right to be represented by a lawyer and that if I cannot afford to pay for a lawyer, one will be provided at no expense to me.
(b) I am charged with Assault in the Second Degree with a Special Finding of a Deadly Weapon Pursuant to RCW 9A.4A.125

The elements are: in Grays Harbor County Washington, did intentionally assault a person with a deadly weapon and that the defendant or an accomplice was armed with a deadly weapon as defined by RCW 9A.41.010 at the time of the commission of said offense.

J-SI (5) I UNDERSTAND I HAVE THE FOLLOWING IMPORTANT RIGHTS, AND I GIVE THEM ALL UP BY PLEADING GUILTY:

- (a) The right to a speedy and public trial by an impartial jury in the county where the crime is alleged to have been committed;
(b) The right to remain silent before and during trial, and the right to refuse to testify against myself;
(c) The right at trial to hear and question the witnesses who testify against me;
(d) The right at trial to testify and to have witnesses testify for me. These witnesses can be made to appear at no expense to me.
(e) I am presumed innocent until the charge is proven beyond a reasonable doubt or I enter a plea of guilty.
(f) The right to appeal a determination of guilt after a trial.

6. IN CONSIDERING THE CONSEQUENCES OF MY GUILTY PLEA, I UNDERSTAND THAT:

(a) The Standard Sentence Range, maximum sentence and fine for each crime charged is:

C O U N T	OFFENDER SCORE	STANDARD RANGE ACTUAL CONFINEMENT (not including enhancements)	PLUS ENHANCEMENTS*	TOTAL ACTUAL CONFINEMENT (standard range including enhancements)	COMMUNITY CUSTODY RANGE (Only for crimes committed on or after 7/1/00. For crimes committed prior to 7/1/00 see paragraph 6(f))	MAXIMUM TERM AND FINE
1	0	3-9 mos	15-21 mos	15-21 mos		10 yrs & 20,000.00
2						
3						

* (F) Firearm, (d) other deadly weapon, (V) VUCSA in protected zone, (VH) Veh. Hom, (see RCW 46.61.520, (JP) Juvenile Present

- (b) The standard sentencing range is based on the crime charged and my criminal history. Criminal history includes prior convictions and juvenile adjudications, whether in this state, in federal court, or elsewhere.
- (c) The prosecutor's statement of my criminal history is attached to the plea agreement. Unless I have attached a different statement, I agree that the prosecutor's statement is correct and complete. If I have attached my own statement, I assert that it is correct and complete. If I am convicted of any additional crimes between now and the time I am sentenced, I am obligated to tell the sentencing judge about those convictions.
- (d) If I am convicted of any new crimes before sentencing, or if any additional criminal history is discovered, both the standard sentence range and the prosecutor's recommendation may increase. Even so, my plea of guilty is binding on me. I cannot change my mind even if additional criminal history is discovered even though the standard sentencing range and the prosecuting attorney's recommendation increase or a mandatory sentence of life imprisonment without the possibility of parole is required by law.
- (e) In addition to sentencing me to confinement, the judge will order me to pay \$500 to the victim's compensation fund. If this crime resulted in injury to any person or damage or loss of property, the judge will order me to make restitution, unless extraordinary circumstances exist which make restitution inappropriate. The amount of the restitution may be up to double my gain or double the victim's loss. The judge may also order that I pay a fine, court costs, attorney fees and the costs of incarceration.
- (f) For crimes committed prior to July 1, 2000: In addition to sentencing me to confinement, the judge may order me to serve up to one year of community supervision if the total period of confinement ordered is not more than 12 months. If this crime is a drug offense, assault in the second degree, assault of a child in the second degree, or any crime against a person in which a specific finding was made that I or an accomplice was armed with a deadly weapon, the judge will order me to serve at least one year of community placement. If the crime is vehicular homicide, vehicular assault, or a serious violent offense, the judge will order me to serve at least two years of community placement. The actual period of community placement, community custody, or community supervision may be as long as my earned early release period. During the period of community placement, community

custody, or community supervision, I will be under the supervision of the Department of Corrections and I will have restrictions on my activities.

For crimes committed on or after July 1, 2000: In addition to sentencing me to confinement, the judge may order me to serve up to one year of community custody if the total period of confinement ordered is not more than 12 months. If the crime I have been convicted of falls into one of the types listed in the following chart, the court will sentence me to community custody for the community custody range established for that offense type unless the judge finds substantial and compelling reasons not to do so. If the period of earned release awarded per RCW 9.94A.150 is longer, that will be the term of my community custody. If the crime I have been convicted of falls into more than one category of offense types listed in the following chart, then the community custody range will be based on the offense type that dictates the longest term of community custody.

OFFENSE TYPE	COMMUNITY CUSTODY RANGE
Serious Violent Offenses	24 to 48 months or up to the period of earned early release, whichever is longer.
Violent Offenses	18 to 36 months or up to the period of earned early release, whichever is longer.
Crimes Against Persons as defined by RCW 9.94A.440(2)	9 to 18 months or up to the period of earned early release, whichever is longer.
Offenses under Chapter 69.50 or 69.52 RCW (Not sentenced under RCW 9.94A.120(6))	9 to 12 months or up to the period of earned early release, whichever is longer.

During the period of community custody I will be under the supervision of the Department of Corrections, and I will have restrictions placed on my activities. My failure to comply with these conditions will render me ineligible for general assistance, RCW 74.04.005(6)(h), and may result in the Department of Corrections transferring me to a more restrictive confinement status or other sanctions.

- (g) The prosecuting attorney will make the following recommendations to the judge: _____

- ☒ The prosecutor will recommend as stated in the plea agreement which is incorporated herein by reference.
- (h) The judge does not have to follow anyone's recommendation as to sentence. The judge must impose a sentence within the standard sentencing range unless the judge finds substantial and compelling reasons not to do so. If the judge goes outside the standard sentence range, either the State or I can appeal that sentence. If the sentence is within the standard sentence range, no one can appeal the sentence.
- (i) If I am not a citizen of the United States, a plea of guilty to an offense punishable as a crime under state law is grounds for deportation, exclusion from admission to the United States, or denial of naturalization pursuant to the laws of the United States.

(j) Public assistance will be suspended during any period of imprisonment.

(k) I understand that I will be required to have a biological sample collected for purpose of DNA identification analysis. For offenses committed on or after July 1, 2002, I will be required to pay a \$100 DNA collection fee.

J I (l) **FIREARMS.** I understand that I may not possess, own, or have under my control any firearm unless my right to do so is restored by a court of record and that I must immediately surrender any concealed pistol permit. RCW 9.41.040 **READ TO DEFENDANT: (judge's Initials)**

NOTIFICATION RELATING TO SPECIFIC CRIMES: IF ANY OF THE FOLLOWING PARAGRAPHS DO NOT APPLY THEY SHOULD BE STRICKEN AND INITIALED BY THE DEFENDANT AND THE JUDGE

J I (m) This offense is a *most serious offense* or "strike" as defined by RCW 9.94A.030, and if I have at least two prior convictions for most serious offenses, whether in this state, in federal court, or elsewhere, the crime for which I am charged carries a mandatory sentence of life imprisonment without the possibility of release.

(n) I may be sentenced as a first time offender instead of given a sentence within the standard range if I qualify under RCW 9.94A.030. This sentence could include as much as 90 days' confinement, two years community supervision, if the crime was committed prior to July 1, 2000, or up to two years of community custody if the crime was committed on or after July 1, 2000, plus all of the provisions described in paragraph (e). Additionally, the judge could require me to undergo treatment, to devote time to a specific occupation, and to pursue a prescribed course of study or occupational training.

(o) If this crime involves a kidnapping offense involving a minor, I will be required to register where I reside, study or work. The specific registration requirements are set forth in the "Offender Registration" Attachment

EC J I (p) If this is a crime of domestic violence, I may be ordered to pay a domestic violence assessment of up to \$100.00. If I, or the victim of the offense, has a minor child, the court may order me to participate in a domestic violence perpetrator program approved under RCW 26.50.150.

(q) If this crime involves prostitution, or drug offense associated with hypodermic needles, I will be required to undergo testing for the human immunodeficiency (AIDS) virus.

(r) The judge may sentence me under the special drug offender sentencing alternative (DOSA) if I qualify under former RCW 9.94A.120(6) (for offenses committed before July 1, 2001) or RCW 9.94A.660 (for offenses committed on or after July 1, 2001.). This sentence could include a period of total confinement in a state facility for one-half of the midpoint of the standard range plus all of the conditions described in paragraph 6(e). During confinement I will be required to take a comprehensive substance abuse assessment and to participate in treatment. The judge will also impose community custody of at least one-half the midpoint of the standard range that must include appropriate substance abuse treatment, a condition not to use illegal controlled substances, and a requirement to submit to urinalysis or other testing to monitor that status. Additionally the judge could prohibit me from using alcohol or controlled substances, require me to devote time to a specific employment or training, stay out of certain areas, pay thirty dollars per month to offset the costs of monitoring and require other conditions, including affirmative conditions.

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- (s) If the judge finds that I have a chemical dependency that has contributed to the offense, the judge may order me to participate in rehabilitative programs or otherwise to perform affirmative conduct reasonably related to the circumstances for which I am pleading guilty.
- (t) If this crime involves the manufacture, delivery, or possession with the intent to deliver amphetamine or methamphetamine, a mandatory methamphetamine clean-up fine of \$3,000.00 will be assessed. RCW 69.50.401(a)(1)(ii).
- (u) If this crime involves a violation of the state drug laws, my eligibility for state and federal food stamps, welfare, and education benefits will be affected. 20 U.S.C. § 1091 and 21 U.S.C. § 862a.
- (v) If this crime involves a motor vehicle, my driver's license or privilege to drive will be suspended or revoked. If I have a driver's license, I must now surrender it to the judge.
- (w) If this crime involves vehicular homicide while under the influence of intoxicating liquor or any drug, as defined by RCW 46.61.502, committed on or after January 1, 1999, an additional 2 years shall be added to the presumptive sentence for vehicular homicide for each prior offense as defined in RCW 46.61.5055(8).
- (x) The crime of _____ has a mandatory minimum sentence of at least _____ years of total confinement. This sentence may not be reduced. This mandatory minimum sentence is not the same as the mandatory sentence of life imprisonment without the possibility of parole described in paragraph 6(m).
- (y) I am being sentenced for two or more serious violent offenses arising from separate and distinct criminal conduct and the sentences imposed on counts _____ and _____ will run consecutively unless the judge finds substantial and compelling reasons to do otherwise.
- (z) I understand that I am pleading guilty to a charge that includes a deadly weapon or firearm enhancement. Such enhancements are mandatory, they must be served in total confinement, and they must run consecutively to any other sentence and to any other deadly weapon or firearm enhancements.
- Eu
JI
- (aa) I understand that the offenses I am pleading guilty to include both a conviction under RCW 9.41.040 for unlawful possession of a firearm in the first or second degree and one or more convictions for the felony crimes of theft of a firearm or possession of a stolen firearm. The sentences imposed for these crimes shall be served consecutively to each other. A consecutive sentence will also be imposed for each firearm unlawfully possessed.
- (bb) I understand that if I am pleading guilty to the crime of unlawful practices in obtaining assistance as defined in RCW 74.08.331, no assistance payment shall be made for at least 6 months if this is my first conviction and for at least 12 months if this is my second or subsequent conviction. This suspension of benefits will apply even if I am not incarcerated. RCW 74.08.290.

7. I plead guilty to:
count one
count _____
count _____
in the original information. I have received a copy of that information.

8. I make this plea freely and voluntarily.

9. No one has threatened any harm to me or to any other person to cause me to enter this plea..

10. No one has made any promises of any kind to cause me to enter this plea except as set forth in this statement.
11. The judge has asked me to state briefly in my own words what I did that makes me guilty of this crime.

This is my statement: On or about August 16, 2004, I did
intentionally assault Roberto Lopez as an
accomplice with a deadly weapon. This act
occurred in Grays Harbor County, Washington.

12. My lawyer has explained to me, and we have fully discussed, all of the above paragraphs and the "Offender Registration" Attachment, if applicable. I understand them all. I have been given a copy of this "Statement of Defendant on Plea of Guilty." I have no further questions to ask of the judge.

Jose Isidro Salas
Defendant

M. J. Fuller

Prosecuting Attorney Bar # 5143

I have read and discussed this statement with the defendant and believe that the defendant is competent and fully understands this statement.

Michael L. Lee

Attorney for Defendant Bar # 28835

The foregoing statement was signed by the defendant in open court in the presence of the defendant's lawyer and the undersigned judge. The defendant asserted that:

- ☒ The defendant had previously read; or
- ☐ The defendant's lawyer had previously read to him or her; or
- ☐ An interpreter had previously read this entire statement and that the defendant understood it in full.

I find the defendant's plea of guilty to be knowingly, intelligently and voluntarily made. Defendant understands the charges and the consequences of the plea. There is a factual basis for the plea. The defendant is guilty as charged.

DATED: 10/4/04

[Signature]
JUDGE

GRAYS HARBOR COUNTY PROSECUTOR

April 20, 2015 - 4:15 PM

Transmittal Letter

Document Uploaded: 7-prp2-466732-Response.pdf

Case Name: In re Jose Isidro-Soto

Court of Appeals Case Number: 46673-2

Is this a Personal Restraint Petition? ☒ Yes ☐ No

The document being Filed is:

Designation of Clerk's Papers

Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: _____

Answer/Reply to Motion: _____

Brief: _____

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: _____

Hearing Date(s): _____

Personal Restraint Petition (PRP)

☒ Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

Comments:

No Comments were entered.

Sender Name: Katherine L Svoboda - Email: ksvoboda@co.grays-harbor.wa.us

A copy of this document has been emailed to the following addresses:

Eric@Makus.com